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18 THE LARYNGEAL MASK COMPANY LTD.  
19 and LMA NORTH AMERICA, INC.

20  
21 **IN THE UNITED STATES DISTRICT COURT**  
22  
23 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

24  
25 THE LARYNGEAL MASK COMPANY ) Civil Action No. 07 CV 1988 DMS (NLS)  
26 LTD. and LMA NORTH AMERICA, INC., )  
27 v. )  
28 Plaintiffs, )  
29 )  
30 AMBU A/S, AMBU INC., AMBU LTD., )  
31 and AMBU SDN. BHD., )  
32 v. )  
33 Defendants. )  
34 )  
35 AMBU A/S, AMBU INC., AMBU LTD., and )  
36 AMBU SDN. BHD., )  
37 v. )  
38 Counterclaimants, )  
39 )  
40 THE LARYNGEAL MASK COMPANY )  
41 LTD. and LMA NORTH AMERICA, INC., )  
42 v. )  
43 Counter-Defendants. )  
44 )

1 Pursuant to this Court's request, Plaintiffs and Counterclaimants The Laryngeal Mask  
2 Company Ltd. and LMA North America, Inc. (collectively "LMA"), hereby submit this *Ex*  
3 *Parte* Motion to Modify the Protective Order entered in this case by the Court on September  
4 3, 2008 to allow outside counsel Stephen Marzen of Shearman & Sterling LLP full access to  
5 all HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL ONLY materials produced in this  
6 case. This *ex parte* motion is supported by the accompanying Memorandum of Points and  
7 Authorities, and the Declaration of Stephen Marzen with supporting exhibits, filed  
8 concurrently herewith, as well as such other oral and/or documentary evidence as may be  
9 presented at or before the time of the hearing.

10 Respectfully submitted,

11 KNOBBE, MARTENS, OLSON & BEAR, LLP

13 Dated: September 25, 2008

14 By: s/Frederick S. Berretta

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 25, 2008, I caused the foregoing **PLAINTIFFS'** ***EX PARTE MOTION TO MODIFY THE PROTECTIVE ORDER*** to be electronically filed with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to the applicable registered filing users.

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I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. 

Dated: September 25, 2008

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